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From: Commanding Officer, Engineering Field Activity, West, Naval Facilities  
Engineering Command  
To: Distribution

Subj: RESPONSES TO COMMENTS ON THE DRAFT COMMUNITY RELATIONS  
PLAN (CRP), NAVAL AIR STATION (NAS), ALAMEDA, CALIFORNIA

Encl: (1) Responses to comments on the CRP, NAS Alameda, CA

1. Enclosure (1) is the Navy's responses to comments from the regulatory agencies and the Restoration Advisory Board on the Draft CRP for the Installation Restoration Program at NAS Alameda. If no comment on these responses is received by 30 August 1996, the CRP will be updated in accordance with these responses.

2. If you have any questions regarding this matter, I can be reached at (415) 244-2526, Code 1831.3, or FAX (415) 244-2654.

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DENNIS WONG  
By direction of  
the Commanding Officer

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## **NAVY RESPONSE TO RAB COMMUNITY OUTREACH FOCUS GROUP COMMENTS ON THE DRAFT COMMUNITY RELATIONS PLAN, NAVAL AIR STATION ALAMEDA**

The Naval Air Station (NAS) Restoration Advisory Board (RAB) Community Outreach Focus Group Chair provided comments on the draft Community Relations Plan (CRP) submitted by Engineering Field Activity West, Naval Facilities Engineering Command (EFA WEST), for NAS Alameda, California. The comments are presented below in bold text, followed by the Navy's responses.

### **GENERAL COMMENTS**

#### **Comment 1:**

**It is recommended that a one-page executive summary of the plan be included as the first section summarizing the purpose and objectives of the plan, the survey techniques and number of completed surveys and interviews, key findings and elements of the Navy's updated Community Relations Plan.**

Response:

The Navy will provide a one-page executive summary of the CRP.

#### **Comment 2:**

**There should be mention of the community relations activities that the State of California Department of Toxic Substance Control (DTSC) and/or Environmental Protection Agency (EPA) are doing, if anything, and how these activities tie into the NAS Alameda Community Relations Plan.**

Response:

The CRP is designed as a resource of possible community relations strategies for the Navy. Outlining the outreach activities of the regulatory agencies, independent of the Navy, is outside the scope of the document. However, preparation and implementation of the CRP is to be consistent with Environmental Protection Agency (EPA) and California Environmental Protection Agency (Cal EPA) guidance for preparing a CRP, and the Base Realignment and Closure (BRAC) Cleanup Team (BCT), including regulatory agencies, will be involved in the Navy's ongoing community relations program.

#### **Comment 3:**

##### **Section 1.0 Introduction**

**If one of the RAB's functions is to act as a conduit for community input to the process, then I believe that the RAB Community Co-Chair should be listed as a contact with the RAB information hotline as the contact number. This comment also applies to fact sheets and newsletters that are published by the Navy.**

Response:

The RAB community co-chair will be listed in the CRP as a contact, with the RAB hotline as the contact number.

#### **Comment 4:**

**In addition, why weren't any of the community responses (over 30) from the mailer, sent out in the Fall 1995, factored into this plan? There were several pages of questions and concerns.**

**although some of them were the same as those mentioned in the plan, it would add to the sample number.**

Response:

Although the mailer is not cited in the CRP, the concerns expressed by those who responded to the mailer are reflected in the concerns summarized in the Community Awareness section.

**Comment 5:**

**Section 2.0 Overview**

**In identifying the purpose and objective of the plan and this update, it is important to emphasize that it should communicate the activities which will be undertaken by the Navy (versus recommended to the navy by the consultant or federal regulation) in response to specific concerns in the area of community relations.**

Response:

The CRP is prepared as a resource of possible strategies for the Navy's ongoing community involvement efforts. The Navy recognizes that community awareness is varied and complex, and that an effective community involvement program is multidimensional; to be effective, a variety of resources are used. The CRP is intended to be a reference tool for those implementing cleanup programs. Flexibility in implementing community involvement strategies is required due to funding, staffing, and other variables in the process. For these reasons, a specific community involvement strategy is not included in the CRP; however, the CRP presents strategies to be used as appropriate for various situations. These strategies are outlined in Section 7.4.1.

**Comment 6:**

**The distinction between interviews and surveys should be noted. It also should be noted how many interviews were conducted and how many written surveys were completed and returned to determine what the sampling base was for drawing specific conclusions.**

Response:

Surveys were distributed only to the RAB, as indicated in Appendix B. Details regarding the interviews, including a list of those interviewed, are also provided in Appendix B.

**Comment 7:**

**There is a comment made regarding the updating of this plan as needed (we should be sensitive to shrinking federal budgets and the need to direct as much money as possible towards cleanup versus plans), it should be written to be comprehensive and cover the entire IR process, through the ROD, and not have to be updated for new IR developments.**

Response:

The Navy agrees that funding should be directed toward cleanup; however, the CRP is not scheduled to be updated unless there are significant changes at NAS Alameda.

**Comment 8:**

**Section 4.2**

**Please include a cross reference of the individual sites with the corresponding operable units so that a relationship can be made to Table 3 and the RI/FS/ROD process for the community relations program.**

Response:  
Operable unit numbers will be added to Table 3.

**Comment 9:**

**These site description sections should be written in a general form and time sensitive comments should be left off or included in a table so that only the table needs to be updated and not the entire text.**

Response:  
The CRP will not be updated unless there are significant changes in the installation restoration program at NAS Alameda. Updated information about specific sites is available in the BRAC Cleanup Plan (BCP), site-specific documents, and fact sheets, or by contacting the NAS Alameda Environmental Office.

**Comment 10:**

**Section 5.2 - *Lawrence-Livermore National Laboratories* should be changed to the Lawrence Livermore National Laboratory. Nationwide is one word in the third paragraph.**

Response:  
Changes will be made as requested.

**Comment 11:**

**Section 5.6 - The Alameda Journal is a biweekly newspaper (printed on Tuesday and Friday).**

Response:  
Changes will be made as requested.

**Comment 12:**

**Section 6.1 - NAS Alameda RAB members were surveyed, not interviewed through a written questionnaire.**

Response:  
Changes will be made as requested.

**Comment 13:**

**Section 6.2 - (5) should read...community's familiarity with the NAS Alameda RAB.**

Response:  
Changes will be made as requested.

**Comment 14:**

**Section 6.2.4 - An additional group of local organizations that might be interested in a presentation are the local yacht clubs (Ballena Bay Y.C., Encinal Y.C., Oakland Y.C., Island Y.C., and Aeolian Y.C.) and marinas (to capture those living on boats).**

Response:  
Changes will be made as requested.

**Comment 15:**

**Section 7.0 - This section would be more effective if it included a matrix of the key community concerns and what/how the Navy plans to address them. The concerns could be grouped into categories as in Section 6.2.2.**

**Response:**

The Navy agrees that understanding the community's concerns is fundamental to an effective community relations program. The Navy believes that the presentation of community concerns in Section 6.2.2 is adequate, as it provides a succinct overview of community concerns.

**Comment 16:**

**Section 7.1.9 - "Additionally, it will be updated to add new information regarding the progress of the IR program and steps to be taken by the Navy." I don't think that this should be the reason that this plan is updated and frankly the above could be accomplished in a newsletter. I would rather have all possible funds directed towards actual cleanup.**

**Response:**

The Navy agrees that funding should be used efficiently and be focused on cleanup. The CRP will be updated only if there are significant changes in the status of the installation restoration program at NAS Alameda or the facility that warrants an update. To clarify this point, the sentence will be rewritten as the following: It will be updated as necessary to add new information regarding the progress of the community relations program and steps to be taken by the Navy.

**Comment 17:**

**Section 7.4.1 - Recommended Community Outreach Activities. This section should not be what is recommended but what the Navy (and RAB?) are planning on doing if it is truly the Community Relations Plan.**

**Response:**

Please see response to comment 5.

**Comment 18:**

**Section 7.4.3 - You may want to add the boating community to the list of outreach opportunities as there are several thousand boats around the island, five yacht clubs, and several marinas and boat yards.**

**Response:**

Changes will be made as requested.

**Comment 19:**

**Section 8.0 - Schedule of Community Relations Activities. This section seems incomplete. The Navy should establish the timeline of community relations activities and include it in this section before this plan is considered complete.**

**Response:**

The CRP does not include a schedule because flexibility in implementing community involvement strategies is required due to funding, staffing, and other variables in the process.

**Comment 20:**

**Appendix N - I would recommend deleting home telephone numbers and addresses from the RAB membership list, particularly community members. I don't think this information is necessary due to the Privacy Act as stated in Appendix B.**

Response:

Changes will be made as requested.

## NAVY RESPONSE TO AGENCY COMMENTS ON THE DRAFT COMMUNITY RELATIONS PLAN, NAVAL AIR STATION ALAMEDA

The U.S. Environmental Protection Agency (EPA), California Environmental Protection Agency (Cal/EPA) Department of Toxic Substances Control (DTSC), and the Regional Water Quality Control Board (RWQCB) provided comments on the draft Community Relations Plan (CRP) submitted by Engineering Field Activity West, Naval Facilities Engineering Command (EFA WEST), for Naval Air Station (NAS) Alameda, California. The draft CRP is dated March 1996. Comments were received from EPA on April 22, 1996, and from DTSC and RWQCB on April 23, 1996. Comments from EPA, DTSC, and RWQCB are presented below in bold text, followed by the Navy's responses.

### DTSC COMMENTS AND NAVY RESPONSES

#### General Comments

##### Comment 1:

**The CRP should reference the former or existing CRP and discuss the history of the community involvement at the base.**

##### *Response:*

*A sentence referencing the existing CRP will be added to the second paragraph of the introduction. The history of community involvement activities at the base is outlined in Appendix I.*

##### Comment 2:

**Other environmental programs, such as the Preliminary Endangerment Assessment and Resource Conservation and Recovery Act (RCRA) Facility Assessment (conducted through the environmental baseline survey [EBS]) and the underground storage tank (UST) program are not discussed in the CRP. These programs and their relationship to the Installation Restoration (IR) program should be described.**

##### *Response:*

*A list of the non-IR environmental programs being conducted at the base will be included as Appendix O.*

##### Comment 3:

**A discussion of Agency oversight in the IR program would be helpful, including roles of the agencies. A graphic may help communicate this.**

*Response:*

*The following will be added to Section 4.1: NAS Alameda is not a National Priorities List site. The state of California is represented by the California Department of Toxic Substances Control (DTSC). DTSC has been designated as the lead state regulatory agency to coordinate California's environmental responsibilities at military facilities. DTSC will ensure that state statutes and regulations are addressed in the decision-making process for site-specific response actions. The California Regional Water Quality Control Board, San Francisco Bay Region (RWQCB) is a support agency for water quality issues.*

*Additionally, a graphic indicating the status of the agencies involved in the cleanup will be added to Appendix A.*

**Comment 4:**

**A community issue not addressed in the CRP is the Federal Facilities Site Remediation Agreement (FFSRA).**

*Response:*

*A discussion of the FFSRA will be incorporated into the CRP as Section 4.1.2.*

**Comment 5:**

**The CRP fails to identify the status of NAS Alameda as a non-National Priorities List site. The State of California, Department of Toxic Substances Control is the lead state regulatory agency overseeing the environmental remediation at NAS Alameda. The laws and regulations of the State of California governing the cleanup of hazardous substances apply at NAS Alameda including those laws and regulations that relate to community involvement.**

*Response:*

*Please see response to General Comment 3.*

### **Specific Comments**

**Comment 1:**

**Reference: Cover**

**The name of the facility could be more prominent. For example, larger, bolder type and placement centered or otherwise in the space where NFEC, EFA WEST is located.**

*Response:*

*The facility name will be set in bold type and placed above the NFEC reference.*

**Comment 2:**

**Reference: Page 1, Section 1.0, Introduction**

**The introduction section should state that NAS Alameda is a non-NPL site and that the California Department of Toxic Substances Control is lead regulatory agency responsible for oversight of the cleanup at NAS Alameda.**

*Response:*

*Please see response to General Comment 3.*

**Comment 3:**

**Reference: Page 1, Section 1.0, Introduction, first paragraph**

**The IR program is also designed to be consistent with the requirements of State laws and regulations, including Chapter 6.8 of the California Health and Safety Code. This law governs hazardous substance release site remediation at non-NPL sites in the State of California.**

*Response:*

*The following sentence will be added to the end of the first paragraph of Section 1.0: The IR program is consistent with the requirements of state laws and regulations, including Chapter 6.8 of the California Health and Safety Code. This law governs hazardous substance release site remediation at non-NPL sites in the State of California.*

**Comment 4:**

**Reference: Page 1, Section 1.0, Introduction, second paragraph**

**The CRP must also be prepared in accordance with state requirements. Please change the third sentence to read: “In accordance with state and federal requirements...” Also please add to this paragraph that state requirements are found in the DTSC’s “Public Participation Policy and Guidance Manual, 7-94” and California Health and Safety Code Sections 25356.1(e) and 25358.7.**

*Response:*

*“State” will be added to the third sentence and the following will be added to the end of the second line in paragraph four: the DTSC Public Participation and Guidance Manual, and California Health and Safety Code Sections 25356.1(e) and 25358.7.*

**Comment 5:**

**Reference: Page 1, Section 1.0, Introduction**

**Please discuss the president’s Fast Track Cleanup Program and the Five Point Plan that directs the military to expand community participation during the base closure and cleanup process.**

*Response:*

*A brief discussion of the president’s Fast Track Cleanup Program and the Five Point Plan will be added to Section 1 after paragraph three.*

**Comment 6:**

**Reference: Page 2, Table 1**

**Please place this table after the conclusion of Section 1 in order not to interrupt the flow of this section.**

*Response:*

*The table will be moved to the end of Section 1.*

**Comment 7:**

**Reference: Page 2, Table 1**

**Please include all contacts including the technical Project Managers for the regulatory agencies and the Base Realignment and Closure (BRAC) Environmental Coordinator (BEC).**

*Response:*

*The name, addresses, and telephone numbers of the BRAC Cleanup Team (BCT) will be added to Table 1.*

**Comment 8:**

**Reference: Page 8, Section 3.1.3, Natural Resources**

**Please clarify the location of Venice Beach. Adding Los Angeles may help to clarify the location.**

*Response:*

*The phrase, "in Los Angeles, California" will be inserted after "Venice Beach."*

**Comment 9:**

**Reference: Page 10, Section 4.0, Overview**

**The statement that none of the identified sites poses an immediate threat to public health is not accurate. Areas of Site 5 have been restricted from access because of high levels of contamination. Also an emergency removal action is currently being conducted at Site 18, the storm sewer system because of the immediate threats to the San Francisco Bay.**

*Response:*

*The following will replace the last sentence of the second paragraph: Preliminary studies indicate that contamination at most of the identified sites poses no immediate threat to public health or the environment. Sites found to pose a potential threat have been identified as candidates for early actions. The Navy is continuing investigations of the base and if any condition is found to pose a potential or an immediate threat to human health and the environment, protective action will be taken.*

**Comment 10:**

**Reference: Page 10, Section 4.1.1, BRAC Cleanup Team**

**Please elaborate on the requirement to establish a BRAC Cleanup Team, Where does the requirement come from?**

*Response:*

*The following will be inserted after the first sentence: This requirement is part of the President's Fast Track Program to expedite cleanup at closing bases by creating a cooperative and efficient relationship between regulatory agencies and the Navy.*

*The following will be inserted after the third sentence: The BCT also interacts with the restoration advisory board (RAB) and the greater community regarding cleanup activities.*

**Comment 11:**

**Reference: Page 11, Section 4.1.2, BRAC Cleanup Plan**

**The BCT's guiding principles were modified in the 1996 BRAC Business Plan. The CRP should elaborate on the application of the principle, "Promote active public involvement." For example: promoting active public involvement means creating an environment where interaction between the Navy, regulatory agencies and the community can take place. The means for establishing this environment are spelled out in the CRP.**

*Response:*

*The following will be inserted at the beginning of the third paragraph: As a guiding principle, the BCT is committed to promoting public involvement by creating an environment where interaction among the Navy, regulatory agencies, and the community can take place.*

**Comment 12:**

**Reference: Page 12, Section 4.2, Installation Restoration Program Sites**

**Please include Treatability Studies with Removal Actions as a means to accelerate the cleanup process.**

*Response:*

*"Treatability Studies" will be included with removal actions at the end of the fifth sentence and the beginning of the sixth sentence. The following will be inserted before the last sentence: Treatability studies allow for the possible use of innovative technologies that may provide accelerated and more efficient cleanup than some standard remedies.*

**Comment 13A:**

**Reference: Page 14, Figure 2**

**Please include Building 1, the location of the RAB Library, and the Environmental Office on this figure. Also, include the location of the Bachelor Officer's Quarters (BOQ), the location of RAB meetings.**

*Response:*

*The location of the environmental office, the RAB library, and the BOQ will be indicated on Figure 2. The figure will be referenced on Page 3 after the description of the information repository.*

**Comment 13B:**

**Reference: Page 15, Section 4.2.2, West Beach Landfill (Site 2)**

**Surface soil contamination also includes metals. Access to the landfill is not restricted, but should be. Currently the jogging path enters the landfill area.**

*Response:*

*The reference to restricting access to the landfill will be removed from the sentence.*

**Comment 14:**

**Reference: Page 16, Section 4.2.5, Building 5 (Site 5)**

**Please explain what is meant by “mild radiation.” Please include in this description the activities planned at Site 5 to deal with the radiation issue. This includes an investigation and removal action if necessary.**

*Response:*

*The reference to “mild radiation” will be removed from the text and a sentence will be added to explain that some pipes have been or are scheduled to be removed at Site 5.*

**Comment 15:**

**Reference: Page 16, Section 4.2.6, Building 41, (Site 6)**

**Please remove the statement that contaminant concentrations are below federal and state regulatory levels. The state and federal agencies have not received or reviewed any documents suggesting no action at Site 6.**

*Response:*

*The sentence referring to no action will be removed from the text.*

**Comment 16:**

**Reference: Page 23, Section 5.2, second paragraph**

**Please describe what type of business and reuse CALSTART represents.**

*Response:*

*A clause indicating that CALSTART is an electric car developer will be added to the sentence about the lease of Hangar 20.*

**Comment 17:**

**Reference: Page 24, Section 5.6, Local Media**

**Not mentioned in this section are local cable television and radio stations that may be of value in getting information to the community.**

*Response:*

*Local cable television and radio stations will be referenced in this section.*

**Comment 18:**

**Reference: Page 25, Section 6.1, Community Interviews, last paragraph**

**Please include DTSC as benefiting from the face-to-face interviews.**

*Response:*

*DTSC will be included as having benefited from the face-to-face interviews with community members.*

**Comment 19:**

**Reference: Page 43, Section 7.1.3, Public Meetings**

**California Health and Safety Code Section (H&SC) 25356.1(h)(3) establishes requirements for remedial actions (removal actions) exceeding one million dollars (\$1,000,000). These remedial actions must comply with H&SC 25356.1(e). The following summarizes the public involvement requirements set forth in that section. 1) Circulate the draft plan for at least 30 days for public comment; 2) Notify affected local and state agencies and publish a notice in a local newspaper; 3) Hold one or more public meetings. Please refer to the legislation to get the actual requirements. An excerpt from the H&SC is enclosed in this letter.**

*Response:*

*The following will be added to the end of the first sentence: and (4) non-time-critical removal actions as applicable in accordance with the California Health and Safety Code.*

**Comment 20:**

**Reference: Page 43, Section 7.1.4, Community Mailing List**

**The development of a community mailing list is a component of DTSC Community Involvement Policy. Our policy requires the inclusion of a mandatory mailing list in all community mailing lists. The most recent mandatory mailing is enclosed in this letter. Please ensure that the DTSC mandatory mailing list is included in the NAS Alameda community mailing list.**

*Response:*

*The DTSC mandatory mailing list will be included in the NAS Alameda Community Mailing List, however, to conserve resources, the Navy will review the list and addresses that appear irrelevant may be excluded.*

**Comment 21:**

**Reference: Page 44, Section 7.1.6, Fact Sheets**

**Please make the description of fact sheets in the CRP consistent with Navy's terminology. Please include a discussion of newsletters here.**

*Response:*

*To distinguish the fact sheets described in this section from the fact sheets described in Section 7.4.1, "proposed plan" will be added to all fact sheet references in this section.*

**Comment 22:**

**Reference: Page 45, Section 7.1.7, Technical Review Committee**

**Only two community members were part of the Technical Review Committee (TRC).**

*Response:*

*The word "several" will be replaced with the word "two" in the reference to community members serving on the TRC.*

**Comment 23:**

**Reference: Page 47, Section 7.2.2, Membership**

**What does core members of the TRC mean? Both TRC members are members of the RAB.**

*Response:*

*"Core" will be removed from the sentence.*

**Comment 24:**

**Reference: Page 50, Second Paragraph**

**Please add regulatory agencies to the last sentence of this paragraph.**

*Response:*

*"Base Realignment and Closure (BRAC) Cleanup Team (BCT)" will be added to the end of the sentence.*

**Comment 25:**

**Reference: Page 51, Issue-Specific Fact Sheets**

**Please add milestone fact sheets to this discussion. These include at the completion of the Remedial Investigation (RI)/Feasibility Study (FS), a draft RAP (?)/Record of Decision (ROD), and draft removal action workplans.**

*Response:*

*A discussion of milestone fact sheets is included in paragraph 4, and in Section 7.1.6. The following will be added to the first sentence of the second paragraph: and as applicable, removal actions.*

**Comment 26:**

**Reference: Page 54, Door-to-Door Flyers**

**Please replace "manpower" with a word that is gender neutral.**

*Response:*

*The word "manpower" will be replaced with the word "labor."*

**Comment 27:**

**Reference: Page 56, first bullet**

**Typo? "custom-made"**

*Response:*

*"Custom-make" will be corrected with "custom-made."*

**Comment 28:**

**Reference: Appendix E, NAS Alameda Community Mailing List**

**Please ensure that addresses on the DTSC mandatory mailing list are included in the NAS Alameda Community Mailing List.**

*Response:*

*The DTSC mandatory mailing list will be included in the NAS Alameda Community Mailing List, however, to conserve resources, the Navy will review the list and addresses that appear irrelevant may be excluded.*

## **EPA COMMENTS AND NAVY RESPONSES**

### **Comment 1:**

**Reference: Section 1.0 Introduction, third paragraph, page 1**

**This paragraph appropriately notes the “economic challenges” posed by the base closure for the community. Base closure obligates the Navy with two related yet distinct responsibilities that should be reflected either in this paragraph or elsewhere in this section: The Navy, as the lead Federal agency, has a responsibility during base closure to ensure that the economic challenges are pursued in a manner that is both expeditious and that is protective of the community, future tenants and the environment. This is also stated as one of the BCT’s guiding principles in the Base Cleanup Plan (BCP).**

*Response:*

*The following will be added to the end of the fourth sentence in paragraph three: that is protective of human health and the environment.*

**Reference: Third paragraph, last sentence**

**Please amend the text to include a statement that notes that the Navy is not only responsible for updating the CRP but for implementing the CRP as well.**

*Response:*

*The following will be added to the end of the last sentence of the third paragraph: and identify strategies that may be implemented by the Navy for addressing community concerns and interests.*

**Reference: Last paragraph, first sentence**

**Please identify all the regulatory agencies involved in the preparation of the CRP, i.e., DTSC, RWQCB. The document cites only the Federal requirements while failing to note state laws and requirements. This is particularly pertinent as NAS Alameda is a non-NPL facility and, accordingly, CAL EPA (DTSC) is the lead regulatory agency for this site (See DTSC review comment numbers 2-4 on the subject document dated 22 April 1996).**

*Response:*

*Please see response to DTSC General Comment 3 and Specific Comment 4.*

### **Comment 2:**

**Reference: Section 1.0, Table 1 “Community Relations Contacts...”**

**Please include EPA Community Relations Specialist, Dorothy Wilson in this table.**

*Response:*

*Contact information for Dorothy Wilson will be included in Table 1.*

**Reference: Section 2.0, overview of the Community Relations Plan, page 5, Appendix F “Navy Suggested Public Meeting Locations.”**

**Comment 3:**

**Reference: Delete “Navy” from the heading. This change more appropriately reflects that the selection of meeting locations, albeit on base, includes community input and was not solely determined by the Navy.**

*Response:*

*“Navy” will be removed from the heading.*

**Comment 4:**

**Reference: Section 3.0 Background of Naval Air Station Alameda, Subsection 3.1.2, first paragraph, last sentence.**

**Please provide information relative to either the next steps and/or time frame for obtaining National Register of Historic Places’ decision for NAS Alameda Historic District.**

*Response:*

*A group of historic buildings in the core area of NAS Alameda was determined to be eligible for the National Register of Historic Places which affords the same protection as a National Register-listed property. To clarify the status of the historic district, the last sentence will be changed to the following: The NAS Alameda Historic District is now protected as it has been determined to be eligible for listing on the National Register of Historic Places. NAS Alameda is eligible because of its association with events that have made a significant contribution to the broad patterns of our history, specifically, the base’s involvement in World War II (Navy 1995).*

**Comment 5:**

**Reference: Section 4.0 “Overview of Activities at...,” page 10, first paragraph, second sentence.**

**The Navy seemingly has two options regarding this sentence: 1) delete it entirely or; 2) reverse the second part of this compound sentence with the first. The rationale for these recommendations stems from the fact that the first sentence accurately and appropriately states that the operations which resulted in the hazardous waste contamination were a result of numerous *routine* operations. The operative word here is *routine*, which implies “standard operating procedures” and presumably consistent with applicable regulations and practices at that time. The second sentence, therefore, does not appear necessary. However, if the Navy’s intent is to provide clarification to what was considered routine operations, then the key import of the sentence is the fact that the operations were, in fact, routine and standard because of the absence of more “stringent federal and state ...disposal requirements” during that time.**

*Response:*

*The sentence will be changed to the following: Although practices were consistent with applicable standards at that time, current federal and state hazardous waste disposal regulations are more stringent than those first created when little was known about the impacts of hazardous materials on the environment.*

**Reference: Second paragraph, last sentence**

**The reference to the results from “preliminary studies” not revealing an “immediate threat to public health,” is not accurate for all sites (For example see DTSC review comments number nine on the subject document in its correspondence to the Navy dated 22 April 1996). Moreover, the larger context of the cleanup projects warrants some commentary and “contextual sense” regarding threats to public health. For example, Fact Sheet #1 clearly and accurately states that the overall potential health threat of exposure to chemicals is dependent upon the completion of the RI. The BCT in the BCP Business Plan and earlier BCP stressed the importance of full risk characterization relative to risk communication statements about potential health risks of exposure to contaminants. Reference to the importance of the RI in this process, which is not yet complete, would appropriately anticipate community comments regarding this issue.**

*Response:*

*The following will replace the last sentence of the second paragraph: Preliminary studies indicate that contamination at most of the identified sites poses no immediate threat to public health. The Navy is continuing investigations of the base and if any condition is found to pose an immediate threat to human health and the environment, protective action will be taken.*

**Comment 6:**

**Reference: Subsection 4.1.1, first paragraph, page 10**

**Please amend the first sentence to show the connection between the President’s Fast Track Cleanup Program and Five Point Plan and the establishment of RABs. The “unique partnership” includes the RAB.**

*Response:*

*The following will be inserted after the first sentence: This requirement is part of the President’s Fast Track Program to expedite cleanup at closing bases by creating a cooperative and efficient relationship among regulatory agencies, the Navy, and the community.*

*The following will be inserted after the third sentence: The BCT also interacts with the RAB and the greater community regarding cleanup activities.*

**Reference: Page 11, first full paragraph, first sentence**

**Explain briefly, the RAB Navy Co-Chair and responsibilities. Include narrative explaining the link between the Navy and the RAB (See review comment number 6 above).**

*Response:*

*The following will be added to the end of the sentence: with a community RAB member. The RAB co-chairs jointly coordinate RAB activities and set the agenda for RAB meetings.*

**Comment 7:**

**Reference: Subsection 4.1.2 "BRAC Cleanup Plan," page 11.**

**Please amend the guiding principles to ensure consistency with the revisions of those discussed in the BCP Business Plan (especially, that which addresses promoting public involvement; again see DTSC review comment number 11 in its correspondence to the Navy dated 22 April 1996). Appendix M does not include a schedule of activities for IR and Non-IR environmental programs. In fact, the title for this appendix "Integration of the Environmental Cleanup, Compliance and Reuse Planning Processes at Alameda" is inconsistent with the aforementioned reference to schedule. Please amend, accordingly.**

*Response:*

*The following will be inserted at the beginning of the third paragraph: As a guiding principle, the BCT is committed to promoting public involvement by creating an environment where interaction among the Navy, regulatory agencies and the community can take place.*

*Additionally, the schedule titled "Naval Complex Alameda. Program Integration for Base Closure" used in the BCP Business Plan will be inserted as the last page of Appendix M.*

**Comment 8:**

**Reference: Section 4.2 Installation Restoration Program Sites, first paragraph, page 12.**

**The third sentence mentions on-going or completed investigation. In order to inform the reader, EPA recommends modifying Table 2 (page 13) by adding a column that will depict the current status of each IRP site. This will provide the reader with the most current and easily accessible information relative to the status of each IRP site.**

**The discussion of removal actions in Appendix C does not provide a description of the removal action process "in greater detail." For example, removal actions, especially non-time critical involve a formal public comment period. This information is particularly pertinent for inclusion in this community relations plan.**

*Response:*

*A description of each site and current conditions is provided in the text; the table is provided as a quick location reference only. Although the Navy agrees that the status of the sites is important, it is not the focus of the CRP. Updated information about each site can be obtained by consulting site-specific documents, the BRAC Cleanup Plan (BCP), the BRAC Business Plan, and the information repository, or by contacting the Navy.*

*The following will be added to the end of the last paragraph in Appendix C: Removal actions that are not time critical involve a formal public comment period prior to formalizing any decisions.*

**Comment 9:**

**Reference:** Subsections 4.2.1 through 4.2.20, pages 12-21.

**In general, these subsections provide informative overviews of the twenty-three (23) IR sites. Moreover, each IRP site subsection correctly references either a treatability study, or a remedial investigation (RI) or feasibility study (FS) report, or an ecological and/or human health risk assessment. However, these discussions relative to these reports are too general and do not reflect the fact that in many cases specific treatability studies and/or removal actions have already been matched with particular IRP sites. For example, Site 13 is being evaluated for steam enhanced extraction (SEE).**

**EPA does note the CRP's discussion of "bioremediation technologies to clean up the contaminated sediments" for Site 17. This type of brief yet informative discussion is applicable to other subsections where treatment technologies are referenced.**

**In addition, the general comprehensive IRP schedule (see Exhibit I attached) identifies the approximate timetable for the RI and FS reports and ecological and human health risk assessment reports. Please consult this schedule for the dates of the reports. The most efficient way to address EPA's concerns would be to simply include the general IRP schedule as an appendix and direct the reader to the appendix for information regarding the projected due dates for the above-discussed reports.**

*Response:*

*The Navy agrees that this information is important. Updated information about each site can be obtained by consulting site-specific documents, the BCP, the BRAC Business Plan, and the information repository, or by contacting the Navy.*

*The schedule titled "Naval Complex Alameda. Program Integration for Base Closure" used in the BCP Business Plan will be inserted as the last page of Appendix M.*

**Comment 10:**

**Reference:** Subsection 5.2. "Economics," first paragraph, page 23.

**In addition to stating the marketable potential of NAS Alameda's land for reuse, a brief summary discussion of the completed finding of suitability to lease (FOSL) evaluations is warranted. Although the leases are yet to be signed by the City of Alameda, a listing of the completed FOSLs would clearly illustrate the marketable potential for reuse purposes and**

**measurably demonstrate the joint efforts by the Navy and regulatory agencies to expeditiously facilitate cleanup and reuse. EPA also recommends including the FOSL schedule as an appendix.**

*Response:*

*The first sentence of the fourth paragraph will be deleted and the following will be inserted at the beginning of the fourth paragraph in Section 5.2: The Navy has an active leasing program to facilitate the community's early reuse of base property prior to closure. This process includes completing a finding of suitability to lease (FOSL). Buildings with the most marketability have been identified and several FOSLs have been completed.*

**Comment 11:**

**Reference: Subsection 5.5 "Community Involvement," page 24.**

**Inclusion of the NAS Alameda RAB within the list of community involvement groups is appropriate.**

*Response:*

*The RAB will be referenced in the list of community groups*

**Comment 12:**

**Reference: Subsection 5.6 "Local Media," last sentence, page 24.**

**Amend the last sentence to be more definitive relative to the local media readership. The newspapers either have a wide readership or they do not. It is reasonable to assume that the former is more accurate and may be verified by obtaining circulation figures from the newspapers. Quick fix: Either delete the word "appear" from the last sentence or delete this sentence entirely. The first sentence in this paragraph implies a fairly significant readership as these are the "primary local newspapers."**

*Response:*

*The word "appear" will be removed from the sentence.*

**Comment 13:**

**Reference: Subsection 6.1 "Community Interviews," first sentence, Page 25.**

**Change "2-week" to "Two-week."**

*Response:*

*The text will be changed as requested.*

**Comment 14:**

**Reference: Subsection 6.2.1. "Community Awareness of..." second paragraph, page 26.**

**This paragraph illustrates one of the primary reasons for maintaining a community relations plan. It addresses in a very lucid manner the issue of awareness and by indicating**

**the importance of measuring the effectiveness of the dissemination of information to the community regarding cleanup activities. Given this analysis of the level of community awareness, a brief discussion of the Navy's strategy for addressing this issue would be useful. Perhaps a "CR Plan strategy section" (e.g., in Section 7.0) is appropriate that would be similar in format to the strategy section found in the BCP.**

*Response:*

*The CRP is prepared as a source of possible strategies for the Navy's ongoing community involvement efforts. The Navy recognizes that community perception is varied and complex, and that an effective community involvement program involves a multidimensional approach that includes use of a variety of resources. The CRP is not intended to be a document for responding to specific concerns or to be prescriptive or binding. Flexibility in implementing community involvement strategies is required due to funding, staffing, and other variables in the process. For this reason, a specific community involvement strategy is not included in the CRP; however, the CRP presents specific strategies to be used as appropriate. These strategies are outlined in Section 7.4.1.*

**Comment 15:**

**Reference: Subsection 6.2.2.1. "Property Reuse and Related Issues," second paragraph, page 28.**

**This paragraph points out a strategy developed as a result of the community interviews, i.e., BCT outreach. Similar to the comments discussed in number 14 above, it [is] useful to have one section in the CR plan devoted to discussion of the Navy's strategy for effective, proactive community relations. Again, perhaps the development of a subsection under section 7.0 could be included in order to discuss the Navy's overall CR strategy for addressing the community's issues identified from the interviews.**

*Response:*

*Please see response to comment 14.*

**Comment 16:**

**Reference: Subsection 6.2.2.3. "Contamination of San Francisco Bay...," page 29.**

**Again, the document provides the reader with a very focused discussion of an issue defined by the community as very important. The BCP Business Plan acknowledges and shares the community's concern regarding this issue of contamination of the San Francisco Bay and its resources. The scope of work for the Ecological Assessment and Human Health Risk Assessment is being developed to address this issue. Acknowledgment of the community's concern of this very salient issue by way of a strategy section in CR plan would clearly demonstrate the Navy's responsiveness.**

*Response:*

*The CRP identifies strategies to improve community involvement but is not the venue for addressing specific community concerns. Provided in the CRP are general strategies for addressing specific community concerns, such as contamination of the San Francisco Bay. Please see response to comment 14.*

**Comment 17:**

**Reference: Subsection 6.2.4. "Information Needs and Community Outreach," page 32**

**See review comment numbers 15 and 16 above.**

*Response:*

*Please see responses to comments 14 and 16.*

**Reference: Page 34, first full paragraph.**

**Please ensure in Section 7.0 or in the proposed CR strategy subsection under Section 7.0 that the Navy clearly discusses how the suggestions offered by the community relative to information needs and outreach will be addressed. This review comment is equally applicable for all the community's suggestions and issues discussed in Section 6.0.**

*Response:*

*Community relations strategies presented in Section 7.4.1 are based on information received in the community interviews. To clarify that this section contains strategies to improve community relations, the section title will be changed to: Community Outreach Strategies.*

*Additionally, the first sentence in this section will be changed to the following: The following community outreach strategies have been developed based on information received during community interviews and the Navy's experience with ongoing community involvement activities. As needed or on request, the following activities may be conducted.*

*Please see responses to comments 14 and 16.*

**Reference: Page 35, first incomplete paragraph.**

**References to the contents of Appendix M are inconsistent with the text. Please provide the correct appendix citation.**

*Response:*

*The two references to Appendix M will be changed appropriately.*

**Reference: Page 36, Subsection 6.2.5.**

**This section illustrates the importance of maintaining an on-going dialogue with the RAB relative to internal matters that may impact the RAB's visibility and role vis-à-vis the**

**community at-large. The proposed CR strategy subsection might discuss the need, for example, of a meeting devoted solely to discussing how to effectively address this very critical issue. For example, this issue could also adversely impact RAB recruitment and retention of members.**

*Response:*

*Please see responses to comments 14 and 16.*

**Comment 18:**

**Reference: Section 7.0 Objectives and Highlights of the Installation Restoration Community Relations Program, introductory paragraph, page 37.**

**The emphasis on fostering a dialogue is fundamental. However, what is missing from this discussion is the answer to the following questions: 1) fostering a dialogue to what end and for whom? From the regulatory perspective, we can answer these questions based on our on-going working relationship with Navy. In terms of the community, the Navy should take the opportunity in this opening paragraph to explicitly restate and reaffirm its commitment and goal of ensuring appropriate community participation and that the community's concerns are and will continue to be addressed. This message is clearly missing from this section. It speaks more to the Navy's position to be in compliance with the community relations requirements. Please redevelop this section, accordingly.**

*Response:*

*The second bullet item, "Ensure compliance with all community relations requirements," will be inserted after the last bullet.*

*Additionally, the following will be added as the first two bullets: (1) Ensure ongoing community participation. (2) Foster communication of community concerns. The first paragraph explicitly states the Navy is committed to community relations "built on trust and cooperation" because the community has a "stake in the cleanup process."*

**Reference: Second paragraph.**

**Please review Appendix I to ensure it is current and comprehensive with respect to CR activities. For example, the list is “too weighted” to what the Navy has done exclusively and/or for the RAB. It does not adequately discuss CR activities done in conjunction with the RAB. Again, it is to the Navy’s credit that these latter types of activities have been conducted and they are worthy of noting in this CR plan.**

*Response:*

*As this is not an exhaustive list of community relations activities at NAS Alameda, the following will be added to beginning of the title on the title page and heading of Appendix I: Examples of.*

*Additionally, Earth Day at the Lawrence Hall of Science will be added to the list of CR activities.*

**Comment 19:**

**Reference: Subsection 7.1 “Navy Community Relations Requirements.”**

**Similar to review comment under number 17 page 35, please re-examine contents of Appendix H. This appendix does not present a “more fully explained” discussion of “U.S. EPA guidelines...” Rather it presents a table which may be “too busy” for the lay person. Presented in conjunction with a brief overview narrative, the table in Appendix H becomes more ‘user friendly’.**

*Response:*

*This table is presented as a reference useful to those interested in a particular issue, such as a proposed plan or record of decision, and the associated community relation requirements. Details of community relation requirements are discussed in Section 7.1.*

**Reference: Page 38-39, Table 3.**

**See comments discussed in the previous paragraph.**

*Response:*

*The table will be slightly modified and condensed so that it fits on one page. Please see response to comment 17.*

**Reference: Page 40-41, Table 4.**

**See comments under Table 3. This table is also too detailed without including, at least, a brief overview discussion.**

*Response:*

*Please see response to the previous comment.*

**Comment 20:**

**Reference: Subsection 7.1.1. "Contact Person."**

**Please delete Sherri Withrow from contact person list for NAS Alameda since she no longer works at the air station.**

*Response:*

*Hans Petersen will be shown as the contact person.*

**Comment 21:**

**Reference: Subsection 7.1.3. "Public Meeting"**

**Please modify this section to be consistent with the approach adopted by the BCT (discussed in the BCP) which is consistent with President Clinton's Fast Track Cleanup Program and Five Point Plan.**

*Response:*

*Per oral instructions from James Ricks (EPA) to Camille Garibaldi (EFA WEST), this comment will not be addressed by the Navy.*

**Comment 22:**

**Reference: Subsection 7.1.4. "Community Mailing List," page 43.**

**Delete the first sentence in this section. Delete Appendix E references in text and delete Appendix E. The text regarding the appendix when viewed against the contents of Appendix E provides no information regarding the mailing list. Also, how will this mailing list be updated? Please note that U.S. EPA concurs with CAL EPA's review comment number 21 regarding this issue.**

*Response:*

*The first sentence in this section will be deleted. A mailing list will be provided in Appendix E.*

**Comment 23:**

**Reference:** Subsection 7.1.6 “Fact Sheets,” first paragraph, page 44.

**The BCT in discussion with and acknowledging the needs of the community has decided that the frequency of preparation and dissemination of fact sheets would be greater than that cited in this paragraph.**

*Response:*

*The fact sheets discussed in Section 7.1.6 are specific to the milestones described in this section. Additional fact sheets will be prepared for issue specific topics of interest to the community as discussed in Section 7.4.1.*

**Comment 24:**

**Reference:** Subsection 7.2.1 “Background and Goals,” page 47, last sentence.

**Please include the DTSC RAB guidelines in Appendix L.**

*Response:*

*DTSC RAB guidelines will included as an appendix.*

**Comment 25:**

**Reference:** Subsection 7.2.2 “Membership,” page 47.

**Please include in this section the acknowledgment that the RAB has developed a charter for implementing its role and responsibilities as well as governing its internal operations.**

*Response:*

*A sentence will be added to the second paragraph acknowledging that the RAB has created a charter for implementing its role and responsibilities as well as governing its internal operations.*

**Comment 26:**

**Reference:** Section 7.4 Establishing and Maintaining Dialogue Beyond the Minimum Requirements, page 48.

**Is this the section which will address the concerns raised as a result of the community interviews? If so, then the text should clearly and explicitly state how these concerns will be addressed. Perhaps, this is the section for the proposed CR strategy discussion.**

*Response:*

*Please see responses to comments 14 and 16.*

**Comment 27:**

**Reference:** Subsection 7.4.1 "Recommended Community Outreach Activities," page 48.

**Please add the following to the bullets under this section: 1) Monthly BCT tracking meetings (for RAB members); and 2) RAB meetings.**

*Response:*

*The following will be added as the first two bullet items:*

- *RAB meetings*
- *Monthly BCT tracking meetings (as approved by the RAB and the BRAC Environmental Coordinator [BEC]).*

**Reference:** Page 53, "Media Activities."

**Delete Sherri Withrow's name as contact person. For rationale, see review comment number 20 discussed above for rationale.**

*Response:*

*Hans Petersen will be shown as the contact person.*

**Comment 28:**

**Reference:** Appendix E, NAS Alameda Mailing List

**Please ensure that addresses on the DTSC mandatory mailing list are included in the NAS Alameda Community Mailing List.**

*Response:*

*The Navy will review the mailing list and will include addresses that are geographically relevant.*